## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

#### SAXTON & STUMP LLC

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### **STARK & STARK, PC**

Marshall T. Kizner, Esq. Joseph H. Lemkin, Esq. 100 American Metro Blvd. Hamilton, NJ 08619 Telephone (609) 791-7022 Attorneys for Prestige

In re:

DARYL FRED HELLER,

Debtor.

Chapter 11

Case Nos. 25-11354 (JNP)

# LIMITED OBJECTION TO LUMA FINANCIAL GROUP, LLC's MOTION FOR ENTRY OF A CONFIDENTIALITY ORDER

Prestige Fund A, LLC, Prestige Fund A IV, LLC, Prestige Fund A IX, LLC, Prestige Fund B, LLC, Prestige Fund B II, LLC, Prestige Fund B IV, LLC, Prestige Fund B V, LLC, Prestige Fund B VI, LLC, Prestige Fund B BTM I, LLC, Prestige Fund A II, LLC, Prestige Fund A V, LLC, Prestige Fund A VI, LLC, Prestige Fund A VII, LLC, Prestige Fund D, LLC, Prestige Fund D III, LLC, Prestige Fund D IV, LLC, Prestige Fund D V, LLC, Prestige Fund D VI, LLC, WF Velocity I, LLC, WF Velocity Fund IV, LLC, WF Velocity Fund VI, LLC, WF Velocity Fund VI, LLC, WF Velocity Fund VII, LLC (collectively, "Prestige") submit this Limited Objection to Luma Financial Group, LLC's ("Luna")Motion for Entry of Confidentiality Order (the "Motion").

### **LIMITED OBJECTION**

- 1. Prestige, the Examiner, and others involved with the Debtor's bankruptcy case (the "Case") have sought and received discovery since the commencement of the bankruptcy case, including Rule 2004 Subpoenas issued to third parties. Prestige does not object to the requested confidentiality order to the extent it relates to confidential documents which have previously not been produced by Luna. To the extent documents and other information have already been disclosed, the proposed Confidentiality Order should not be applicable.
- 2. Prestige objects insofar as the Confidentiality Order should only apply to new documents produced by Luma and not to documents already produced by other third-parties whatsoever. Confidentiality designations should not be made regarding documents already produced.

### **CONCLUSION**

For the foregoing reasons Prestige requests that the Court grant the Motion subject to the conditions set forth above and grant such other and further relief as the Court deems appropriate.

Respectfully submitted,

STARK & STARK A Professional Corporation

By:/s/ Marshall T. Kizner
MARSHALL T. KIZNER, ESQ.

By:/s/ Joseph H. Lemkin JOSEPH H. LEMKIN, ESQ. 100 American Metro Blvd. Hamilton, NJ 08619 (609) 791-7922 (direct) (609) 896-9060 (main) (609) 895-7395 (facsimile)

-and-

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Fund A IV, LLC, Prestige Fund A IX, LLC,
Prestige Fund B, LLC, Prestige Fund B II, LLC,
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LLC, Prestige Fund B VI, LLC, Prestige Fund B
VII, LLC, Prestige Fund B BTM I, LLC, Prestige
Fund A II, LLC, Prestige Fund A V, LLC,
Prestige Fund A VI, LLC, Prestige Fund A VII,
LLC, Prestige Fund D, LLC, Prestige Fund D
III, LLC, Prestige Fund D IV, LLC, Prestige
Fund D V, LLC, Prestige Fund D VI, LLC,
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LLC, WF Velocity Fund IV, LLC, WF Velocity
Fund V, LLC, WF Velocity Fund VI, LLC and
WF Velocity Fund VII, LLC

Dated: August 11, 2025,